

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
 )  
Plaintiff, )  
 )  
JOE WILLIS, GODWIN ENAGBARE, )  
JOHN BALDWIN, )  
JOHANNES KAINDOH, )  
WAYNE HENDERSON, AND )  
LEONARD BELL, )  
 )  
Plaintiff-Intervenors, )  
 )  
v. )  
 )  
WASHINGTON GROUP )  
INTERNATIONAL, INC. )  
 )  
Defendants )  

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Civil Action No. 04-12097 GAO

**JOINT MOTION TO SUBSTITUTE EXHIBIT B ON CONSENT DECREE**

The parties respectfully request that the Court allow the instant motion to substitute the attached revised Exhibit B to the Consent Decree. The revised exhibit includes critical information about the division of the settlement awards as between wages and compensatory damages received by Charging Parties and claimants in this case.

The parties agree and understand that this amended exhibit does not change any of the obligations in the Decree (including the timing of the payments required therein).

WHEREFORE, the parties request that this Joint Motion be granted.

Date: April 2, 2008

Respectfully submitted on behalf of and with the authority of Defendant and Plaintiff  
Intervenor's counsel to this action,

**/s/ R. Liliana Palacios-Baldwin**

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**CERTIFICATE OF ELECTRONIC FILING**

I, R. Liliana Palacios, hereby certify that on this 2<sup>nd</sup> day of April 2008, I filed the instant  
document with the U.S. District Court of Massachusetts Electronic Case Filing system.

**/s/ R. Liliana Palacios**  
Senior Trial Attorney